

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NORTH JERSEY SURGERY CENTER a/s/o
D.D.,

Plaintiff,

CIVIL ACTION NO.: 12-7003

v.

HORIZON BLUE CROSS BLUE SHIELD OF
NJ; UNITED PARCEL SERVICE; ABC
CORP. 1-10,

Defendants.

**DEFENDANT HORIZON'S APPLICATION FOR EXTENSION OF TIME TO
ANSWER, MOVE OR OTHERWISE REPLY**

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order extending by fourteen (14) days the time within which Defendant may answer, move or otherwise reply to the Complaint filed by Plaintiff herein. In support of this application, it is represented that:

1. No previous extension has been obtained;
2. This action was initiated in the Superior Court of the State of New Jersey, Law Division, Bergen County. Defendant received the Summons and Complaint on October 11, 2012. The matter was removed to this Court by Horizon on November 9, 2012 and entered by this Court on November 14, 2012.

3. The time to answer, move or otherwise reply under Fed. R. Civ. P. 81(c) expires on November 16, 2012. Accordingly, this application is served prior to the expiration of the period sought to be extended.

CONNELL FOLEY LLP
Liberty View
457 Haddonfield Rd., Ste. 230
Cherry Hill, NJ 08002
(856) 317-7100

*Attorneys For Defendant
Horizon Blue Cross Blue Shield of New
Jersey*

BY: s/Edward S. Wardell
Edward S. Wardell, Esquire

DATE: November 15, 2012

ORDER

The above application is **GRANTED** and Defendant Horizon's time to answer, move or otherwise respond is extended to November 30, 2012.

WILLIAM T. WALSH, Clerk

By: _____
Deputy Clerk

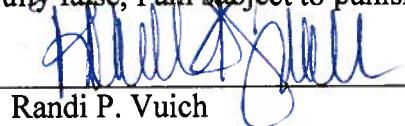
Dated:

CERTIFICATE OF SERVICE

I, Randi P. Vuich, of full age, hereby certify that the within Application for Extension of Time has been electronically filed with the Clerk within the time and in the manner prescribed by the Rules of Civil Procedure and that a copy of the within pleading has been served this date, via email, upon:

Andrew Bronsnick, Esquire
50 Packanack Lake Road East
Wayne, NJ 07470

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Randi P. Vuich

DATE: November 15, 2012